

REMARKS

Amendment to the claims

Independent device claim 16 was clarified to recite that the claimed integrated IP network comprises *"a plurality of IP networks"*. Support for this amendment can for example be found in figure 3 of the application (e.g. networks 2, 3, 4) and the corresponding portion of the specification.

Claim 16 was also clarified to recite that the integrated IP network comprises *"a plurality of network node devices, said network node devices including address management tables comprising a plurality of records"*. Support for this amendment can for example be found in figure 3 of the application (e.g. network node device 5-X) and figure 5 of the application (table of figure 5) and the corresponding portion of the specification.

Claim 16 was also clarified to recite that the integrated IP network comprises *"a first network node device being connected to a first IP network via a first internal line and being connected to a second IP network via a second internal line, and a second network node device being connected to said first IP network via a third internal line and being connected to said second IP network via a fourth internal line"*. Support for this amendment can for example be found in figure 3 of the application (e.g. first & second internal lines between network node device 5-X and IP networks 2 & 3, second network node device 5-Y, third & fourth internal lines between network node device 5-Y and IP networks 2 & 3) and the corresponding portion of the specification.

Claim 16 was also clarified to recite that the integrated IP network comprises *"first and second records being set at an address management table in said first network node device; the first record comprising a network identifier that designates the first IP network and*

the second record comprising a network identifier that designates the second IP network". Support for this amendment can for example be found in figure 5 of the application (e.g. first & third records in figure 5, identifying "Video network" and "General network") and the corresponding portion of the specification.

Claim 16 was also clarified to recite that the integrated IP network comprises "*a first terminal being connected to said first network node device by a first network node terminal via a first communication line, and a second terminal being connected to said second network node device by a second network node terminal via a second communication line*". Support for this amendment can for example be found in figure 3 of the application (e.g. first terminal 8-1 connected to network node device 5-X and second terminal 8-2 connected to network node device 5-Y) and the corresponding portion of the specification.

Claim 16 was also clarified to recite that the integrated IP network operates such that "*when an external IP packet sent from said first terminal is input to said first network node device from said first network node terminal, said first network node device compares an IP address and a port number included in said external IP packet with an IP address and a port number included in said first record*". Support for this amendment can for example be found in figure 10 of the application (e.g. steps S200, S202, S203) and the corresponding portion of the specification.

Claim 16 was also clarified to recite that the integrated IP network operates such that "*if the IP address and port number included in said external IP packet and the IP address and port number included in said first record coincide respectively, said first network node device IP-capsulates said external IP packet and then forms an internal IP packet, said first network node device sending said internal IP packet to said first internal line, and said internal IP packet being transferred in said first IP network and said third internal line and then reaching said second network node device, in compliance with the network identifier in said first record*". Support for this amendment can for example be found in figure 10 of the

application (e.g. steps S203, S206 and S207) and the corresponding portion of the specification.

Claim 16 was also clarified to recite that the integrated IP network operates such that *"if said IP addresses and said port numbers do not coincide, said first network node device compares the IP address and the port number included in said external IP packet with an IP address and a port number included in said second record, and if the IP address and port number included in said external IP packet and the IP address and port number included in said second record coincide respectively, said first network node device IP-capsulates said external IP packet and then forms an internal IP packet, said first network node device sending said internal IP packet to said second internal line, and said internal IP packet being transferred in said second IP network and said fourth internal line and then reaching said second network node device, in compliance with the network identifier in said second record, or if said IP addresses and said port numbers do not coincide, said external IP packet is discarded"*. Support for this amendment can for example be found in figure 10 of the application (e.g. steps S203, S206 and S207) and the corresponding portion of the specification.

Claim 16 was also clarified to recite that the integrated IP network operates such that the *"external IP packet"* received by the second network node device is *"restored from said internal IP packet at said second network node device, and said external IP packet being sent to said second terminal via said second communication line"*. Support for this amendment can for example be found in figure 13 of the application (e.g. steps S220, S221 and S222) and the corresponding portion of the specification.

The Applicants note that the examples given above are only provided for ease of reference and can by no mean be used to restrict the scope of claim 16. Claim 16 is also for example supported by other figures of the application, such as figure 14. Reference to these other figures was omitted for clarity.

Pending claims 17-22 were cancelled without prejudice.

A new claim 23 was added to recite that *“said comparison on said addresses and said port numbers is carried out on addresses only”*. Support for claim 23 can for example be found in original claim 2.

A new claim 24 was added to recite that *“said first IP network is an IP telephone network or said second IP network is an IP data network”*. Support for claim 24 can for example be found in paragraph [0043] of the specification.

A new claim 25 was added to recite that *“said first IP network is an IP multicast network or said second IP network is a best-effort network”*. Support for claim 25 can for example be found in paragraph [0043] of the specification.

A new claim 26 was added to recite that the recited integrated IP network further comprises *“at least one domain name server in one of said IP networks”*, and to recite the operation of the recited integrated IP network and domain name server. Support for new claim 26 can be found for example in figure 14 of the application, as well as in the corresponding portion of the specification; or in original claim 6.

A new claim 27 was added to recite an integrated IP network substantially as in claim 1, but wherein the network node device restricts its matching operations to ports numbers. Support for new claim 27 can be found in the same portion of the application as for amended claim 16.

A new claim 28 was added to recite that the integrated IP network of claim 27 is such that *"said first IP network is an IP telephone network, or said second IP network is an IP data network, an IP multicast network or a best-effort network"*. Support for claim 28 can for example be found in paragraph [0043] of the specification.

The Applicants expressly reserve the right to prosecute any cancelled matter in the present application or in any derivative thereof.

Claim rejections under 35 U.S.C. 101

Pending claims 16-22 stand rejected under 35 U.S.C. 101 for being directed to non-statutory subject matter, and in particular for being directed to software only.

The Applicants note that claim 16 was amended to clarify that the invention as claimed relate to an integrated IP network including the hardware features of *"a plurality of IP networks" "a plurality of network node devices"; "a first network node device being connected to a first IP network via a first internal line and being connected to a second IP network via a second internal line"; "a second network node device being connected to said first IP network via a third internal line and being connected to said second IP network via a fourth internal line, first and second records being set at an address management table in said first network node device"; and "a first terminal being connected to said first network node device by a first network node terminal via a first communication line, and a second terminal being connected to said second network node device by a second network node terminal via a second communication line"*.

The Applicants respectfully submit that claim 16 as amended clearly relates to a plurality of hardware features operating in combination, and therefore relates to patentable subject matter in the sense of 35 U.S.C. 101.

At least in view of the above, the Applicants respectfully submit that claim 16 as amended relates to patentable subject matter in the sense of 35 U.S.C. 101. Claims 17-22 were cancelled.

The Applicants note that similarly, independent new claim 27 relates to a plurality of hardware features operating in combination; and claims 23-26 and 28 depend on claim 16 or claim 27, and therefore also relate to a plurality of hardware features operating in combination. Accordingly, the Applicants respectfully submit that new claims 23-27 relate to patentable subject matter in the sense of 35 U.S.C. 101.

Claim rejections under 35 U.S.C. 112

Pending claims 16-22 stand rejected under 35 U.S.C. 112, first paragraph, for containing subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the art that the inventors had possession of the claimed invention at the time the application was filed.

The Applicants note that, as detailed above, claim 16 was clarified to relate to features fully supported by the original specification, and respectfully submit that at least in view of the above, claim 16 as amended relates unambiguously to the written description made in the specification as filed, in compliance with 35 U.S.C. 112.

Claims 17-22 were cancelled.

The Applicants note that similarly, independent new claims 23-28 relate to features fully supported by the original specification. Accordingly, the Applicants respectfully submit that new claims 23-27 comply with 35 U.S.C. 112.

Pending claims 16-22 also stand rejected under 35 U.S.C. 112, first paragraph, for failing to comply with the enablement requirement.

The Applicants note that, as detailed above, claim 16 was clarified to relate to features discussed and detailed in the original specification, and respectfully submit that at least in view of the above, the original specification and for example the description of the structure and the operation of the integrated IP network illustrated in figures 3 or 14 of the application, would have enabled the person skilled in the art to implement an integrated IP network such as recited in claim 16 as amended.

Accordingly, the Applicant respectfully submits that claim 16 as amended complies with the enablement requirement as provided by 35 U.S.C. 112.

Claims 17-22 were cancelled.

The Applicants note that similarly, independent new claims 23-28 relate to features fully enabled by the original specification. Accordingly, the Applicants respectfully submit that new claims 23-27 comply with the enablement requirement as provided by 35 U.S.C. 112.

Pending claims 16-22 also stand rejected under 35 U.S.C. 112, second paragraph, for failing to particularly point out and distinctly claim the subject matter which the Applicants claim as the invention.

The Applicants note that claim 16 was amended to clearly recite a combination of hardware features and the operation of such combination, and respectfully submit that at least in view of the above, claim 16 as amended complies with the second paragraph of 35 U.S.C. 112.

Claims 17-22 were cancelled.

The Applicants note that similarly, independent new claim 27 as well as dependent claims 23-26 and 28 relate to a plurality of hardware features in combination and the operation of such combination; whereby new claims 23-27 particularly pointing

out and distinctly claiming the subject matter which the applicant regards as his invention, in compliance with the second paragraph of 35 U.S.C. 112.

Claim rejections under 35 U.S.C. 103

Pending claims 16-22 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. 6,807,169 to Mattahil or over Mattahil and U.S. 5,867,495 to Elliot. The Applicants respectfully disagree with the Examiner.

In particular, the Applicants note that Mattahil derives from U.S. provisional application No. 60/250,783, filed on November 30, 2000. On the other hand, the present application is a divisional of U.S. application No. 09/568,515, filed on May 9, 2000 which itself claims priority of a first Japanese application having the Serial No. 128956/1999, filed May 10, 1999 and of a second Japanese application having the Serial No. 13154/2000, filed January 21, 2000.

The Applicants note that the priority date of Mattahil is later than the Japanese priority dates of the parent of the present application, and is even later than the U.S. filing date of the parent of the present application. Accordingly, Mattahil is not a valid prior art reference for the present application, because it was filed after the priority date(s) of the present application.

At least in view of the above, the Applicants respectfully submit that claim 16 as amended, as well as new claims 23-28, are patentable over Mattahil or over a combination of Mattahil and Elliot.

* * *

In view of the above, the Applicant submits that the application is now in condition for allowance and respectfully urge the Examiner to pass this case to issue.

The Commissioner is authorized to charge any additional fees that may be required or credit overpayment to deposit account no. 12-0415. In particular, if this response is not timely filed, the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 CFR 1.136(a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 12-0415.

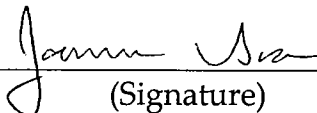
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(Date of Transmission)

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